

[Service Date February 9, 2007]

February 9, 2007

**NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS  
(By March 21, 2007)**

RE: Rulemaking to Consider Amending WAC 480-120-262(8) Emergency calls – E911; Docket UT-070199

TO ALL INTERESTED PERSONS:

On February 7, 2007, the Washington Utilities and Transportation Commission (Commission) filed with the Office of the Code Reviser a Preproposal Statement of Inquiry (CR- 101) to consider whether to amend WAC 480-120-262(8) Emergency calls (E-911). Subsection (8) reads:

*(8) **Emergency calls.** For purposes of emergency calls, every OSP must be able to transfer the caller into the appropriate E911 system and to the public safety answering point (PSAP) serving the location of the caller with a single keystroke from the operator's console, to include automatic identification of the exact location and address from which the call is being made. The OSP must be able to stay on the line with the emergency call until the PSAP representative advises the operator that they are no longer required to stay on the call. The OSP must provide a toll-free number for direct access to PSAPs should additional information be needed when responding to a call for assistance from a phone using the provider's services. That emergency contact information must not be considered proprietary.*

WAC 480-120-262(8) requires that Operator Service Providers (OSP) be capable of transferring an emergency call back to the 911 system with the call routed to the correct Public Safety Answering Point (PSAP) for the location of the caller. The evolution of OSP services to regional or national operations makes this requirement

technically difficult. Operators at one time had access to company service records that would assist in locating the caller to identify the correct PSAP for transferring emergency calls. OSPs may no longer have that complement of customer information for a number of reasons, the most prevalent of which is a change in business practice that sees most OSP service outsourced, or provided by a business unit that operates under a separate line of business. Requirements aimed at limiting the inappropriate use of customer information by competitive business units may even preclude the OSP from having access to the necessary customer location records. Additionally the regional or national centers generally are not able to connect to the local E911 network to be able to transfer calls into the E911 systems. These and other considerations suggest that we review the rule.

The intent of the current rule is to clearly assure that when a customer dials “O” for the operator and the call turns out to be an emergency, the OSP associate can transfer the call back into the 911 system with the call routed correctly. The State of Washington has installed rapid transfer capability that links all PSAPs in Washington and Oregon. This permits calls arriving at a PSAP to be rapidly moved to another PSAP should that be necessary.

This capability only works, however, if the call arrives on the 911 network. There are several ways of permitting direct transfer to the 911 network, as required by the current rule, but all have limited functionality. The necessary technical capability is being planned for future implementation in order to serve similar needs from Telematics providers and services like Video Relay or Speech-to-Speech translation. At this time there appears to be no readily available technical capability to permit OSP transfer onto the 911 network as required.

To assist us in evaluating whether to amend WAC 480-120-262(8), we request that you answer the following questions.

1. Within a two-week period, how many callers do you advise to hang up and call 9-1-1?
2. Within a two-week period, how many callers do you actually transfer to the 911 network?
3. What suggestions do you have for educating those who use operator services that 911 is a better option?

**WRITTEN COMMENTS**

Written comments must be filed with the Commission no later than **Wednesday, March 21, 2007**. The Commission requests that comments be provided in electronic format to enhance public access, for ease of providing comments, to reduce the need for paper copies, and to facilitate quotations from the comments. Comments may be submitted by electronic mail to the Commission's Records Center at [<records@wutc.wa.gov>](mailto:records@wutc.wa.gov). Please include:

- The docket number of this proceeding (UT-070199).
- The commenting party's name.
- The title and date of the comment or comments.

An alternative method for submitting comments is by mailing or delivering an electronic copy to the Commission's Records Center on a compact disk or 3 ½ inch, IBM-formatted, high-density disk, in .pdf Adobe Acrobat format or in .doc Word 97 or later format. Include all of the information requested above. The Commission will post on its web site all comments that are provided in electronic format. The web site is located at the following URL address: [www.wutc.wa.gov/070199](http://www.wutc.wa.gov/070199).

If you are unable to file your comments electronically or to submit them on a disk, the Commission will accept a paper document. Questions may be addressed to Rebecca Beaton at (360) 664-1287 or e-mail at [rbeaton@wutc.wa.gov](mailto:rbeaton@wutc.wa.gov).

Opportunity for further comment is anticipated. Information about the schedule and other aspects of the rulemaking, including comments, will be posted on the Commission's web site as it becomes available. If you wish to receive further information on this rulemaking you may:

- 1) Call the Commission's Records Center at (360) 664-1234.
- 2) E-mail the Commission at [<records@wutc.wa.gov>](mailto:records@wutc.wa.gov).
- 3) Mail written comments to the address below.

When contacting the Commission, please refer to Docket UT-070199 to ensure that you are placed on the appropriate service list(s). The Commission's mailing address is:

Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

Sincerely,

**CAROLE J. WASHBURN**  
Executive Secretary